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CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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Dear Paul,

The California Farm Bureau Federation has reviewed the first three volumes of the April 2005 Draft State Water Plan Update, otherwise known as Bulletin 160-2005, and certain chapters of the fourth volume which have been made available to us.

We are aware, as are you, that one of our members, Alex Hildebrand, has several times expressed his concern that the bulletin does not express appropriate concern as to the anticipated imbalance between future food demand in California compared with the future capability of agriculture to produce that food. The land is available, but the water with which to irrigate the crops, in extended periods of less than normal rainfall, is of great concern to us. The plan does not reflect this situation, which we consider hazardous.

The department seems to rely on continued ability of agriculture to produce greater quantities of food with ever decreasing available supplies of irrigation water. Although that trend is obvious and important, we believe the state should recognize the fact that the human population growth is not now controlled, whereas the elasticity of extent to which water is a limiting factor in food production is probably finite.

We urge you to plan for more than "study" the necessity to build surface and groundwater storage projects. It would certainly be better to have too much capability to withstand droughts than too little.

Therefore our most substantive comment on the Bulletin 160-05 is that the list of 14 recommendations inside the back cover of the "Highlights" should have a 15th point added, and appropriate back-up material in the supporting volumes, reflecting the urgency of developing more drought resiliency in storage of water supplies.

In many parts of the state, agriculture generally was very comfortable with the amount of water allocated and available for its purposes. As urban supplies were pressed to serve an ever-increasing population, agriculture to urban water transfers have been relied on to accommodate urban requirements. However, this has resulted in following farmland and in some cases, far into

the future. This has detrimental effects on California's agricultural economy, and if continued to be relied on as a source of urban and environmental water, will be detrimental to US food security.

It is obvious that the U. S. population of humans is increasing in size, weight and numbers. Is it not then obvious that the food requirements of the state and likewise the nation, will also increase?

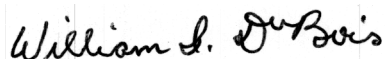
The Water Code requires that this bulletin be predicated on sound scientific attributes and analysis, but there appears to have been a fundamental shift in what the water plan has traditionally presented. This changes it into a somewhat politicized consensus driven quasi-policy document.

We regret that we must express our conviction that the DRAFT State Water Plan Update fails to warn the readers that the plan offers only a very optimistic expectation of 1. How efficient agriculture can become and 2. How confidently we can depend on present food importers to supply this nation at monetary and political prices we can afford to pay.

The balance of our criticism of DRAFT Bulletin 160 is mainly editorial and a matter of correcting a few errors in typesetting or preferences in sentence construction etc., which have been presented to you separately, previously.

With the above exceptions we wish to congratulate the Department staff on the comprehensiveness of this effort. We have appreciated the opportunity to be part of your advisory process.

Sincerely,

A handwritten signature in cursive script that reads "William I. DuBois".

William I. DuBois
Natural Resources Consultant
California Farm Bureau Federation

DRAFT BULLETIN 160-05
SUGGESTED DETAIL CHANGES BY CALIFORNIA FARM BUREAU FEDERATION

The Executive Summary titled “Highlights” mentions reservoirs once surface storage twice, groundwater storage twice, water storage twice, but extols the virtues of having water “available when and where needed” on page 9. We do not feel comfortable that the 14 points in the Recommendations will accomplish that aim.

VOLUME 1

Chapter One

Page 1-4: Omit the words “great” and “distant” in the first line of Future Scenarios. It seems more accurate to say that ..., we don’t know with ...certainty what will happen in the ...future...

Line 6: we suggest...the water community has little control regarding population growth...

Page 1-5: next to last paragraph on page, last full line, “DWR plans to publish five water plan updates during this plan’s 2030 planning horizon.”

Page 1-6: Top line, we suggest you omit the word “colorful” under “Volume 1 Strategic Plan”, second line “This process is intended to become the standard for future water plan updates.”

Pages 1-1 to 1-11: we find very helpful in setting the stage for the bulletin.

Pages 12-15: seem less essential.

Chapter 2 “Keeping Land in Private Ownership” (Stewardship)

Pages 2-2, 4: In the list of “Fundamental Lessons” we believe the last of the six bullets is the most important of them all, and should be listed first.

Page 2-5: Our choice would be to recognize three key initiatives, the first being to improve the state’s capability to withstand long dry periods. This would facilitate the two listed points.

Page 2-9: Top of page – we think it is too early in the process to list Salton Sea in the category of those needing protecting and restoring. The Salton Sea’s only statutory function is to serve as a repository for agricultural drainage, and that it serves now, and does not need “restoring.” Its other functions are the result of a combination of other happenstances, and these are undergoing study now by state and federally authorized groups who are attempting to agree or disagree on solutions.

Page 2-11: We disagree with (Box 2-5) the phrase “Not all regions need more storage...” While that may be true, the areas that need storage the most do not have the best storage sites, and so the

state's needs must be considered best served by locating storage in the best places. These may not be places, which, themselves, need more storage. Shasta is certainly a prime example.

Chapter 3

Page 3-1: Under "Setting" we suggest an alternate sentence: "California, being about a thousand miles from northwest to southeast corners, contains some of the world's most diverse land, scenery and climate."

Page 3-2: "The location and timing of our variable water uses do not coincide with replenishment by the state's natural water supplies."

Page 3-3: First full paragraph "Since 1990 our population has increased..." our question is, do you mean 15 years, or 10 years since the last federal census? We suggest this be quantified. On the population issue, you mention LA as most populous, and that Riverside and Orange are 3rd and 4th, but don't mention which county is second in population. Is this intended?

Page 3-4: Third paragraph, we suggest: "Neither agricultural nor environmental requirements are ~~not~~ always met."

Page 3-5: We support inserting as the 4th sentence in the 2nd paragraph under CHALLENGES: "During dry years agriculture also needs more water than usual from storage because less rainfall increases irrigation needs." And the third paragraph, fourth line: "the federal Central Valley Project (CVP) are ~~not~~ less foreseeable in the near term."

Page 3-6: Dry year challenges sixth line, "Ecosystems are strained, ~~tasking~~ affecting sensitive and ~~endangered~~ plants, animals and habitats." Third paragraph, fifth line, "Energy utilities were forced to substitute fossil-fueled power for less costly hydro generation..." (We think the present text misstates the substitution). Fifth paragraph, we suggest an insert in the last sentence: "The Colorado River is California's largest interstate water source, and a significant source of hydro-electric power..."

Page 3-16: paragraph subtitled "Drainage:" The lack of agricultural drainage plagues the poorly drained area..

Page 3-18; bottom paragraph, third line, "supported" should be used instead of "supports," since there are virtually no fish left in the sea. Seventh and eighth lines, comment is that the drains do not contribute, rather they transmit pesticides and nutrients, but the selenium does not even come from Imperial Valley soils, but is in the irrigation source water. Last sentence,: "If a solution is not developed and begun soon, Salton Sea may ~~become~~ will continue to be too saline..."

Page 3-20: Second paragraph, last line, "... causes increased stream sedimentation to downstream areas as well." Under "Reponses," first line "Today's water management considers a broader range of issues... Our question is what is it "broader" than? It is not clear from the text.

Page 3-23: "Statewide and Interregional Response": We would offer a rewrite of the second sentence to read: However, the State and the courts have ~~has~~ led collaborative efforts to find solutions to water issues having broad public benefits such as protecting and restoring the DELTA, SALTON SEA, LAKE TAHOE AND MONO LAKE.

Page 3-24: paragraph titled "Colorado River Agreement" we suggest in the interest of uniformity deleting authors names in the legislation mentioned, as you have in prior citations. The following paragraph, we question whether the QSA will "reduce" inflows of runoff from agriculture to the Salton Sea? Also is not 44000 PPM more like 1/3 saltier than the 33000 PPM of most of the ocean than 25% given in the next sentence?

Pages 3-30 to 3-38: We appreciate the inclusion of these pages, which speak to water rights. We find there is much misconception among water users as to these issues. However, the fourth line from the bottom of the paragraph on "Groundwater Use and Management" needs some editing, we believe.

Page 3-35: California Government, fifth line, the word "shall" does not seem to be needed in the sentence.

Page 3-36: Federal Government – we suggest adding to the first sentence "and regulates the diversions from the Colorado River, the second largest of its projects."

Page 3-42: We question ~~whether~~ the reference to the Delta's 350 acres of freshwater marsh. That seems like an unrealistic quantity of freshwater marsh for an area the size of the Delta for a period of 70 years?

Chapter Four

Page 4-1: It seems we do not need "Recent scientific studies" to show that we face a great deal of uncertainty about climate, droughts, and change!

Page 4-10: Scenario One - bullet on Agriculture, third sentence, the "Increased cost of land is shrinking agricultural land availability" needs some qualification that this refers to land that has water rights to available water and is not in demand for housing or other development.

Page 4-11: Scenario Two – agriculture same type of comment. The second sentence needs the words "and water" added after "new land." There is lots of good productive land available in California, if it only had water!

Page 4-12: Scenario Three – agriculture – this paragraph needs the addition of another phrase: “....but very little new agricultural land has any feasible water source.”

Page 4-15: First paragraph in italics needs another sentence to complete the thought as follows: “Furthermore, they do not provide for additional food needed by the half million or more additional mouths the state must feed each year and the water to grow that food, or the imbalance in foreign trade that results from the importation of that food.”

Page 4-16: at the top paragraph, speaks clearly to the problem in regards to urban water requirements, environmental and agricultural needs, but again completely ignores the increased population’s food requirements. Instead, it indicates the problem is going to be dealt with in the year 2010.

Page 4-17 bottom of page: Urban demand increases, ag demand decreases, but where does the food come from? This must indicate DWR thinks farmers are terribly water inefficient now or they would not make such a forecast. We do not share that confidence level!

Page 4-19, 20, 21: Discussion of future of agriculture in California. Seems realistic and encouraging but does not calculate the state’s future food requirements or where it will come from.

Chapter 5

Chapter 5 speaks to the 14 recommendations. We recommend the 15th should be included here to speak to the issue of increasing water storage capability.

Page 5-13: Indicates the state limits its storage candidates to those that have regional support and viable financing. The facility that may come closest to this is Auburn Dam on the American River, and that is not even discussed in the Bulletin 160-05.

VOLUME TWO

Chapter One: No Comments

Chapter Two

Page 2-1: We want to express our appreciation for the mention in the opening paragraph that considers “keeping land in private ownership” as a laudable objective. We are concerned that the new term Stewardship has been introduced, since we consider Agricultural Management to cover all the aspects mentioned.

Page 2-2: Throughout this section the term “crop idling” is used as a substitution for “fallowing.” This is unfortunate, because it appears to indicate a crop would not grow. It does not mean

this. As used here, crop idling actually means that no crop would be grown on an individual field that period of time. We believe the term fallowing is a much better term. There are a few instances where the term fallowing is used. DWR needs to make a better argument for its use of “crop idling” if it continues to use that expression.

The last partial paragraph, first line, the verb “use” should be “used.” The last line of this paragraph (top of page 2-3), we think should read, “It offers a temporary alternative to retirement of agricultural lands.”

Page 3-1, 2, 3: Having been progenitors of AB 3616 and the Agricultural Water Management Council, we think this is a very important factor in encouraging water districts and farmers to voluntarily improve their operations. We appreciate the way DWR has explained the Council’s activities. We are somewhat distressed to learn otherwise that some legislators think this program should now become mandatory.

Page 3-4: discusses: Regulated Deficit Irrigation. This is a practice long established in several crops to accomplish objectives other than to save water. We are not pleased that it is treated here mainly as a means to reduce water use, especially when the following crop must irrigate to replace the “deficit” before being established. Be aware of the dangers of double accounting the water use reduction.

Page 3-5: Discusses the virtue of the QSA. It seems unless the courts dismiss the challenges that it is confronted with on the QSA, DWR should at least mention that it is undergoing a court challenge.

Page 3-11: (Point 7) The 49 word second sentence needs a little editing.

Page 3-12: California Energy Commission (typo)

Chapter 4

Page 4-1: box on Groundwater Recharge – the word “artificial” should not be given the dignity of this discussion. There is nothing artificial about recharging groundwater. It is real, but induced rather than natural. Still the second line of the text on Conjunctive Management employs the term twice in the six lines above the title and once on the 4th line of the following page (4-2).

Chapter 5

Page 5-2: Omit the comma on the end of the 4th line from the bottom of the page.

Page 5-6: DWR recommends financing the lining of the AA Canal but does not discuss the problems or arguments concerning international comity.

Chapter 6

Page 6-2: Point 4 on desalination needs more definition or explanation. Point 8 needs work. You can't have effective desalination without brine discharge.

Page 6-4: Cost is an issue not only to consumers. Frequently they don't pay the whole cost. (Delete: "to consumers" 6 lines from bottom of page)

Page 6-5: Seawater Intakes – third and fourth lines in this paragraph use word "may" once too often.

Chapter 7

Page 7-1: Fifth line from top delete "of"

Chapter 8

Page 8-1 "Water" omitted in MWD at second bullet. The word "free" is incorrectly used both times. The cost of these items are born by others or hidden in the charges for other services. This does not mean they are unwise inducements.

Page 8-2: The box on Rate Structure Examples needs work. Under "Tiered Water Rate" – should read: "The water user pays a higher or lower rate for each succeeding unit of water. Some call this increasing or declining block rates." The example also needs to be shown for the declining rates, such as 75 cents and 50 cents. Then you can drop the last sentence because it will have been exemplified.

Chapter 9: No Comments

Chapter 10

Page 10-1: It seems to us that periodic flooding is a preferred alternative to keeping rivers in their channels only to a particular group of constituents, but it does have compensating benefits.

Page 10-3: The pages should be shown to residents of Laguna Beach for their comments!

Chapter 11, 12, 13: No Comments

Chapter 14

Page 14-1: We would differ. The first "serious cloud seeding" occurred in San Diego County a long time before 1948 and the guy who did it, as we remember the story, never got paid because he was so successful that it caused tremendous damage.

Page 14-2: says results of cloud seeding are "difficult to determine" but box says "scientific proof is lacking." The bottom paragraph says more water 300,000 to 400,000 acre-feet "may be available."

Page 14-4: says if power plant owners quit cloud seeding "this would result in some loss..." We believe it should say "... this might result in some loss..." In spite of this uncertainty, Recommendation No. 3 says "DWR should investigate the potential..." We would support that, but would not bet the family farm on it.

Chapter 15

Page 15-2: In the box on “Recharge Areas.” We hope that DWR can drop the use of “artificial” used twice here to describe induced, managed or intentional.

Page 15-3: top line “...but the effectiveness of that program is uncertain at best.”

Page 15-5: contains a caution that “Eminent Domain should not be allowed to convert potential recharge areas to other uses.” This appears to us to be a valuable policy recommendation.

Page 16-6: Recommends academic programs in schools on the subject of water reuse research and education. We endorse.

Chapter 17

Page 17-1: Endorses more storage as crucial to successfully meeting (the goals of Cal Fed). We would extend that policy to benefit the whole state.

Chapter 18

Page 18-1: indicates if CALFED rejects any of the candidate storage projects this would not kill it as a candidate for other areas. We support that expression of policy.

Chapter 19

Page 19-3: the indented paragraph on “Lake Level Criteria” needs editing.

Page 19-6: between the bottom of page 6 and the top of page 7 some words or lines are missing.

Chapter 20

Page 20-2: AB 2717 is an example in inconsistency in policy regarding including the legislator author’s name, all or none would be better.

Page 20-3: same comment.

Page 20-4: top of page – is the word “management” missing?

Chapter 21

Page 21-1: Urban Runoff Management – We in agriculture are encouraged to line our canals to save water. This reduces streamside vegetation and habitat to zero. This section stated as a loss, the resulting reduction in multiple benefits. Somehow the DWR and the public needs to come to grips with the issue of “efficiency vs. habitat loss.” Agriculture is painfully aware of the dichotomy in policies.

Page 21-2: The bottom of the preceding page and the top of this page illustrate opposing reasons for soil naturally acting as a contributor of pollutants and as a filter of pollutants. This illustrates the problem, but not the solution.

Chapter 22

Page 22-5: Word left out of lines below top of page.

Page 22-7: Same problem in bottom-line on page.

Chapter 23

Page 23-1: near center of page “crop idling” used twice. At the bottom of the page durations of transfers is quoted as varying in duration from 2 to 35 years. It should be two to seventy-five years, with the longer period depending on mutual assent. At 35 years the buyer can back out, at 45 years either party can cause the deal to terminate.

Page 23-5: bottom line, and in footnote, “crop idling” is used. As usual we think this is a poor choice of words. On the next page (23-6) at the second line from the top, you prove our point by speaking to the effects of idling 20% of the rice land but at the bottom of the same paragraph you use “crop idling” again!

Page 23-7: and twice on this page.

Page 23-8: and three times on this page, but in between them you use the term “fallowed land.”
Perplexing!

Page 23-9: again. First word on page.

Page 23-10: twice on this page. Also point 3b. Describes what SWRCB did to the Imperial Irrigation District – San Diego County Water Authority transfer to cause the fallowing of many thousands of acres of farmland for a period of 15 or more years.

Chapter 24

NO COMMENTS

Chapter 25

Page 25-2: Misspelled word-last line in “disrupting” paragraph

Page 25-6: The line immediately above the Table 25-1 still uses Table XX

Chapter 26

Page 26-1: “Crop idling” used 8 times, “land fallowing” only once. In the Westlands Water District drainage issue--all agricultural landowners everywhere should study this issue thoroughly to know what politics can do to a formerly thriving area.

Page 26-2: DWR here uses “land retirement as a descriptive term to describe their use of “crop idling.” The same thing on the next page. We think land retirement ought to mean leaving land fallow for more than one year, and fallowing should mean for periods of one year or less. We don’t know what crop idling is intended to mean. These words are used so indiscriminately and to explain each other that it is very confusing. We recommend the phrase “crop idling” be retired permanently unless you intend to prohibit the growing of a particular crop, in which crop idling would be appropriate. It is puzzling why you quote Yuma Arizona as a location when it is only about a mile from Winterhaven, California as an example of geographic interest.

VOLUME THREE

Chapter 11

Colorado River Region is now the only region on which I feel up to date enough to comment on.

Page 11-8: top line, “.....the 11D the state’s largest irrigation district,...(Westlands is a water district)

Page 11-9: please note (2nd line) acres of farmland were idled. In the box on Salton Sea Ecosystem, third line, says the sea is 25% saltier than the ocean. We think it is closer to 33% saltier than the ocean, which in most areas is about 33000 PPM.

Page 11-10: Some comment on 33%. Much of this page is duplicative of the information in the box on the previous page.

Page 11-11: bottom paragraph says Salton Sea is the primary focus of water quality issues in the Colorado River Region. It should not be, because of more importance are the threats to water quality in the upper river above and below Glen Canyon Dam which affect both drinking water utility and crop growing utility.

Page 11-13: One issue is the policy on printing author's names with legislative bills (first full paragraph). The balance of the information on this page may be interesting discussion after the present court challenges are settled and international relations are also settled.

Page 11-14: the box on this page 2003 Period, Estimated Savings, needs editing, perhaps in seven places.

Page 11-15: add "DWR and Salton Sea" at end of sentence in middle of last paragraph on page which ends "...water use from IID to SDCWA and to CVWD"

Page 11-17: the box at the top of page, next to last sentence, does not quantify time period for which SDCWA is to have use of conserved water from lining AA Canal. Is it 110 years? Third from bottom of page "Above average rainfall occurred during water year only in Blythe in 1998"

End of comments as of June 10, 2005 on bulletin 160-05 DRAFT.